

1 Derrick Talerico (State Bar No. 223763)
2 dtalerico@wztslaw.com
3 Paige T. Rolfe (State Bar No. 331096)
4 prolf@wztslaw.com
5 WEINTRAUB ZOLKIN
6 TALERICO & SELTH LLP
7 11766 Wilshire Boulevard, Suite 730
8 Los Angeles, CA 90025
9 Telephone: (424) 500-8552

10
11 Counsel to Debtors Broadway Avenue
12 Investments, LLC, SLA Investments, LLC,
13 and Negev Investments, LLC

14

15 **UNITED STATES BANKRUPTCY COURT**

16

17 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

18

19 In re:

20 SEATON INVESTMENTS, LLC, *et al.*,

21

22 Debtors and Debtors in
23 Possession.

24

25 Affects All Debtors.
26 Affects Seaton Investments, LLC (*Dismissed*)
27 Affects Colyton Investments, LLC (*Dismissed*)
28 Affects Broadway Avenue Investments, LLC
29 Affects SLA Investments, LLC
30 Affects Negev Investments, LLC
31 Affects Alan Gomperts
32 Affects Daniel Halevy
33 Affects Susan Halevy

34 Lead Case No. 2:24-bk-12079-VZ

35 Jointly Administered with Case Nos.:
36 2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
37 2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
38 2:24-bk-12074-VZ; 2:24-bk-12075-VZ
39 and 2:24-bk-12076-VZ

40 Chapter 11

41 **STIPULATION TO RESCHEDULE
42 HEARING ON MOTION TO
43 APPROVE SETTLEMENT
44 AGREEMENT WITH ARCHWAY
45 BROADWAY LOAN SPE, LLC
46 UNDER RULE 9019 OF THE
47 FEDERAL RULES OF
48 BANKRUPTCY PROCEDURE**

49 Current Hearing:

50 Date: September 23, 2025
51 Time: 11:00 a.m.
52 Courtroom: 1368
53 255 E. Temple Street
54 Los Angeles, CA 90012

55

1 Broadway Avenue Investments, LLC (“Broadway”), SLA Investments, LLC (“SLA”), Negev
2 Investments, LLC (“Negev,” together with Broadway and SLA, the “Corporate Debtors”), Susan
3 Halevy (“Susan” or “Susan Halevy”), Daniel Halevy (“Daniel” or “Daniel Halevy”), and Alan
4 Gomperts (“Alan” or “Alan Gomperts,” together with Susan and Daniel, the “Individual Debtors,”
5 and the Individual Debtors, collectively with the Corporate Debtors, the “Debtors”), and Archway
6 Broadway Loan SPE, LLC (“Archway,” together with the Debtors, the “Parties”), hereby stipulate as
7 follows:

8 **RECITALS**

9 A. On July 10, 2025, Debtors filed their *Motion to Approve Settlement Agreement and*
10 *Supporting Documents with Archway Broadway Loan SPE, LLC* (“Motion”) pursuant to Federal Rule
11 of Bankruptcy Procedure (“FRBP”) 9019 [Dkt. 526]. The Motion set forth the material terms of a
12 settlement between the Debtors and Archway that would resolve all disputes amount the Parties.

13 B. The Motion was calendared for a hearing on August 19, 2025. Pursuant to the
14 *Stipulation to Reschedule Hearing on Motion to Approve Settlement Agreement with Archway*
15 *Broadway Loan SPE, LLC Under Rule 9019 of the Federal Rules of Bankruptcy Procedure* [Dkt. 545]
16 filed on August 13, 2025, the August 19, 2025 hearing was continued to September 23, 2025 (the
17 “Continued Hearing”).

18 C. Archway filed a Limited Opposition [Dkt. 540] to the Motion, to reserve and preserve
19 its rights while the Parties document the settlement, including a settlement agreement and ancillary
20 documents, which process is still ongoing.

21 D. The Parties require additional time to document the settlement and have, therefore,
22 agreed to reschedule the Hearing to November 18, 2025.

23 **STIPULATION**

24 WHEREFORE, based on the recitals, the Parties stipulate as follows:

- 25 1. The Hearing should be continued to November 18, 2025 at 11:00 a.m.;
- 26 2. This continuance is without prejudice to the Parties moving to advance the continued
27 hearing should circumstances permit;
- 28 3. This continuance is without prejudice to further continuance requests.

SO STIPULATED.

Dated: September 19, 2025

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

By: /s/ Derrick Talerico

Derrick Talerico

Attorneys for Debtors Broadway Avenue Investments, LLC,
SLA Investments, LLC, and Negev Investments, LLC

Dated: September 19, 2025

SAUL EWING LLP

By:

Attorney:

Attorneys for Defendants
Susan Halevy

Attorneys for Debtors Alan Gomperts, Daniel Halevy, and Susan Halevy

Dated: September 19, 2025

FRANDZEL ROBINS BLOOM & CSATO, L.C.

By:

Gerrick M. Warrington

Attorneys for Archway Broadway Loan SPE, LLC

1 **SO STIPULATED.**

2
3 Dated: September 19, 2025

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

4 By: /s/ Derrick Talerico

5 Derrick Talerico

6 Attorneys for Debtors Broadway Avenue Investments, LLC,
7 SLA Investments, LLC, and Negev Investments, LLC

8 Dated: September 19, 2025

9 SAUL EWING LLP

10 By: _____

11 Zev Shechtman

12 Attorneys for Debtors Alan Gomperts, Daniel Halevy, and
13 Susan Halevy

14 Dated: September 19, 2025

15 **FRANDZEL ROBINS BLOOM & CSATO, L.C.**

16 By: _____

17 Gerrick M. Warrington

18 Attorneys for Archway Broadway Loan SPE, LLC



PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
11766 Wilshire Blvd, Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled (specify): Declaration of Auriel Streit in Support of Debtors **Stipulation to Reschedule Hearing on Motion to Approve Settlement Agreement with Archway Broadway Laon SPE, LLC Under Rule 9019 of the Federal Rules of Bankruptcy Procedure** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) September 19, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF Service List

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) September 19, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent Zurzolo
United States Bankruptcy Court
255 E Temple St Suite 1360
Los Angeles, CA 90012

(via Priority Mail)

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 19, 2025
Date

Martha E. Araki
Printed Name

/s/ Martha E. Araki
Signature

Seaton Investments, LLC – Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Haley, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Garrison Vanderfin, Tanya Behnam:** gvanderfin@polsinelli.com, tbehnam@polsinelli.com; tanyabehnam@gmail.com; ladocketing@polsinelli.com; zyoung@polsinelli.com; ccripe@polsinelli.com;
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- Attorneys for Creditor United States of America on behalf of the Internal Revenue Service: **Robert F Conte:** robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Christopher Crowell:** ccrowell@hrhllaw.com
- Attorneys for Creditors Archway Real Estate Income Fund I SPE I, LLC, Archway Broadway Loan SPE, LLC, fka Archway Real Estate Income Fund I REIT, LLC, Archway Real Estate Income Fund, and Plaintiff Archway Broadway Loan SPE, LLC: **Michael G. Fletcher, Bruce D. Poltrack, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditors NewRez LLC d/b/a Shellpoint Mortgage Servicing, Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldrigepte.com; TSG@ecf.inforuptcy.com; tgaran@aldrigepte.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Richard Girkado:** rgirkado@counsel.lacounty.gov
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@buchalter.com; gvidales@buchalter.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@crownandstonelaw.com
- Attorneys for Creditor UrbanLime Real Estate: **Lovee D Sarenas:** lovee.sarenas@dinsmore.com; wendy.yones@dinsmore.com
- Attorneys for Creditor AIRE Ancient Baths Los Angeles, LLC: **David B Shemano:** dshemano@shemanolaw.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpreigion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov